

RANDALL S. LUSKEY (SBN: 240915)  
rluskey@paulweiss.com  
**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
535 Mission Street, 25th Floor  
San Francisco, CA 94105  
Telephone: (628) 432-5100  
Facsimile: (628) 232-3101

ROBERT ATKINS (*Pro Hac Vice* admitted)  
ratkins@paulweiss.com  
JACQUELINE P. RUBIN (*Pro Hac Vice* admitted)  
jrubin@paulweiss.com  
CAITLIN E. GRUSAUSKAS (*Pro Hac Vice* admitted)  
cgrusauskas@paulweiss.com  
ANDREA M. KELLER (*Pro Hac Vice* admitted)  
akeller@paulweiss.com

**PAUL, WEISS, RIFKIND, WHARTON  
& GARRISON LLP**  
1285 Avenue of the Americas  
New York, NY 10019  
Telephone: (212) 373-3000  
Facsimile: (212) 757-3990

*Attorneys for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC

*[Additional Counsel Listed on Following Page]*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**STIPULATION AND [PROPOSED] ORDER  
REGARDING CERTAIN FACT SHEET  
DEADLINES**

This Document Relates to:

*Jane Doe CLF V.M. v. Uber Technologies,  
Inc., et al.*, No. 3:25-cv-1022-CRB

*Jane Doe CLF A.H. v. Uber Technologies,  
Inc., et al.*, No. 3:25-cv-1023-CRB

*Jane Doe CLF K.R. v. Uber Technologies,  
Inc., et al.*, No. 3:25-cv-1025-CRB

Judge: Hon. Charles R. Breyer  
Courtroom: 6 – 17th Floor

1 *Jane Doe CLF K.G. v. Uber Technologies,*  
2 *Inc., et al., No. 3:25-cv-1028-CRB*

3 *Jane Doe CLF B.T. v. Uber Technologies,*  
4 *Inc., et al., No. 3:25-cv-1029-CRB*

5 *Jane Doe CLF H.K. v. Uber Technologies,*  
6 *Inc., et al., No. 3:25-cv-1031-CRB*

7 *Jane Doe CLF C.G. v. Uber Technologies,*  
8 *Inc., et al., No. 3:25-cv-1033-CRB*

9 *Jane Doe CLF K.J. v. Uber Technologies,*  
10 *Inc., et al., No. 3:25-cv-1035-CRB*

11 *Jane Doe CLF A.C. v. Uber Technologies,*  
12 *Inc., et al., No. 3:25-cv-1037-CRB*

13 *Jane Doe CLF T.S. v. Uber Technologies,*  
14 *Inc., et al., No. 3:25-cv-1038-CRB*

15 *Jane Doe CLF S.H. v. Uber Technologies,*  
16 *Inc., et al., No. 3:25-cv-1040-CRB*

17 *Jane Doe CLF A.B. v. Uber Technologies,*  
18 *Inc., et al., No. 3:25-cv-1041-CRB*

19 *Jane Doe CLF J.T. v. Uber Technologies,*  
20 *Inc., et al., No. 3:25-cv-1043-CRB*

21 *Jane Doe CLF L.K. v. Uber Technologies,*  
22 *Inc., et al., No. 3:25-cv-1045-CRB*

23 *Jane Doe CLF J.R. v. Uber Technologies,*  
24 *Inc., et al., No. 3:25-cv-1046-CRB*

25 *Jane Doe CLF D.T. v. Uber Technologies,*  
26 *Inc., et al., No. 3:25-cv-1048-CRB*

27 *Jane Doe CLF S.F. v. Uber Technologies,*  
28 *Inc., et al., No. 3:25-cv-1050-CRB*

*Jane Doe CLF S.W. v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-1051-CRB*

*Jane Doe CLF K.B. v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-1053-CRB*

*Jane Doe CLF H.P. v. Uber Technologies,*  
*Inc., et al., No. 3:25-cv-1285-CRB*

1 KYLE N. SMITH (*Pro Hac Vice* admitted)  
ksmith@paulweiss.com  
2 JESSICA E. PHILLIPS (*Pro Hac Vice* admitted)  
jphillips@paulweiss.com  
3 **PAUL, WEISS, RIFKIND, WHARTON**  
    **& GARRISON LLP**  
4 2001 K Street, NW  
Washington DC, 20006  
5 Telephone: (202) 223-7300  
Facsimile: (202) 223-7420  
6

7 *Attorney for Defendants*  
UBER TECHNOLOGIES, INC.,  
RASIER, LLC, and RASIER-CA, LLC  
8

9 MICHAEL B. SHORTNACY (SBN: 277035)  
mshortnacy@shb.com  
10 **SHOOK, HARDY & BACON, L.L.P.**  
2049 Century Park East, Suite 3000  
11 Los Angeles, CA 90067  
Telephone: (424) 285-8330  
12 Facsimile: (424) 204-9093

13 PATRICK OOT (*Pro Hac Vice* admitted)  
oot@shb.com  
14 **SHOOK, HARDY & BACON, L.L.P.**  
1800 K St. NW, Suite 1000  
15 Washington, D.C. 20006  
Telephone: (202) 783-8400  
16 Facsimile: (202) 783-4211

17 JEREMIAH S. WIKLER (*Pro Hac Vice* admitted)  
jwikler@shb.com  
18 **SHOOK, HARDY & BACON, L.L.P.**  
2555 Grand Blvd.  
19 Kansas City, MO 64108  
Telephone: (816) 474-6550  
20 Facsimile: (816) 421-5547

21 *Attorney for Defendants*  
UBER TECHNOLOGIES, INC.,  
22 RASIER, LLC, and RASIER-CA, LLC  
23  
24  
25  
26  
27  
28

TRACEY B. COWAN (SBN 250053)  
RYAN J. CLARKSON (SBN 257074)  
OLIVIA E. DAVIS (SBN 353041)  
**CLARKSON LAW FIRM, P.C.**  
22525 Pacific Coast Hwy.  
Malibu, CA 90265  
Telephone: (213) 788-4050  
Email: tcowan@clarksonlawfirm.com  
Email: rclarkson@clarksonlawfirm.com  
Email: odavis@clarksonlawfirm.com

*Attorneys for Clarkson Plaintiffs*

**STIPULATION**

**WHEREAS**, on March 19, 2024, the Court entered Pretrial Order No. 10, which states that “Plaintiffs will either submit bona fide ride receipts or the ride information detailed in PTO No. 5,” and that Plaintiffs shall serve either the bona fide ride receipt or Pretrial Order No. 5 information sheet “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation Order at 3, Dkt. 348. The Court also set the Plaintiff Fact Sheet and Defendant Fact Sheet deadlines for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS and execute applicable Authorizations within 30 days of the case being filed in, removed to, or transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride information form . . . .” *Id.* at 6;

**WHEREAS**, Plaintiffs’ counsel does not, at present, have established communications with certain of these Plaintiffs, and an extension of the deadline for the fact sheet submissions would provide more time to submit accurate fact sheets;

**WHEREAS**, the parties have agreed that the deadline to provide a Plaintiff Fact Sheet for the Plaintiffs in the following cases, each represented by Clarkson Law Firm, P.C. (“Clarkson”), should be extended to March 24, 2025:

1. *Jane Doe CLF V.M. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1022-CRB
2. *Jane Doe CLF A.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1023-CRB
3. *Jane Doe CLF K.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1025-CRB
4. *Jane Doe CLF K.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1028-CRB
5. *Jane Doe CLF B.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1029-CRB
6. *Jane Doe CLF H.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1031-CRB
7. *Jane Doe CLF C.G. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1033-CRB
8. *Jane Doe CLF K.J. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1035-CRB
9. *Jane Doe CLF A.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1037-CRB
10. *Jane Doe CLF T.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1038-CRB

11. *Jane Doe CLF S.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1040-CRB
12. *Jane Doe CLF A.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1041-CRB
13. *Jane Doe CLF J.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1043-CRB
14. *Jane Doe CLF L.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1045-CRB
15. *Jane Doe CLF J.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1046-CRB
16. *Jane Doe CLF D.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1048-CRB
17. *Jane Doe CLF S.F. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1050-CRB
18. *Jane Doe CLF S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1051-CRB
19. *Jane Doe CLF K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1053-CRB
20. *Jane Doe CLF H.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1285-CRB

**WHEREAS**, the parties have agreed that the deadline to provide a Defendant Fact Sheet for the aforementioned Plaintiffs represented by Clarkson should be extended to April 23, 2025;

**WHEREAS**, the parties have agreed that these deadlines may be subject to revision based on further discussion and agreement amongst the parties (or, in the absence of agreement, via application to the Court) about why changed circumstances (e.g., a significant additional volume of filings of cases by other law firms) may warrant further adjustment to the deadlines. Nothing about this stipulation changes any obligations of the parties with respect to requirements set out in prior orders as to the provision of bona fide ride receipts, the provision of information outlined in PTO 5, or the inclusion of the applicable authorizations/responsive documents.

**THEREFORE**, the parties respectfully request the Court enter the parties' stipulation establishing that:

1. A Plaintiff Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson is due on March 24, 2025;
2. A Defendant Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson is due on April 23, 2025; and
3. These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause above.

1                   **IT IS SO STIPULATED.**

2  
3           Dated: March 6, 2025

**PAUL, WEISS, RIFKIND, WHARTON &  
GARRISON LLP**

4  
5           By: /s/ Randall S. Luskey

6           ROBERT ATKINS  
7           RANDALL S. LUSKEY  
8           KYLE N. SMITH  
9           JACQUELINE P. RUBIN  
10          JESSICA E. PHILLIPS  
11          CAITLIN E. GRUSAUSKAS  
12          ANDREA M. KELLER

**SHOOK, HARDY & BACON, L.L.P.**

10          MICHAEL B. SHORTNACY  
11          PATRICK OOT  
12          JEREMIAH S. WIKLER

13          *Attorneys for Defendants*  
14          UBER TECHNOLOGIES, INC.,  
15          RASIER, LLC, and RASIER-CA, LLC

16  
17          Dated: March 6, 2025

**CLARKSON LAW FIRM, P.C.**

18          By: /s/ Tracey B. Cowan

19          Tracey B. Cowan (SBN 250053)  
20          Ryan J. Clarkson (SBN 257074)  
21          Olivia E. Davis (SBN 353041)  
22          22525 Pacific Coast Hwy.  
23          Malibu, CA 90265  
24          Telephone: (213) 788-4050  
25          Email: tcowan@clarksonlawfirm.com  
26          Email: rclarkson@clarksonlawfirm.com  
27          Email: odavis@clarksonlawfirm.com

28          *Attorneys for Clarkson Plaintiffs*

**FILER'S ATTESTATION**

I, Randall S. Luskey, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: March 6, 2025

By: /s/ Randall S. Luskey  
Randall S. Luskey

1  
2  
3  
4  
5  
6  
7 UNITED STATES DISTRICT COURT  
8 NORTHERN DISTRICT OF CALIFORNIA  
9 SAN FRANCISCO DIVISION  
10

11 IN RE: UBER TECHNOLOGIES, INC.,  
12 PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No. 3:23-md-03084-CRB

**[PROPOSED] ORDER REGARDING  
CERTAIN FACT SHEET DEADLINES**

13 This Document Relates to:

14 *Jane Doe CLF V.M. v. Uber Technologies,*  
15 *Inc., et al.*, No. 3:25-cv-1022-CRB

16 *Jane Doe CLF A.H. v. Uber Technologies,*  
17 *Inc., et al.*, No. 3:25-cv-1023-CRB

18 *Jane Doe CLF K.R. v. Uber Technologies,*  
19 *Inc., et al.*, No. 3:25-cv-1025-CRB

20 *Jane Doe CLF K.G. v. Uber Technologies,*  
21 *Inc., et al.*, No. 3:25-cv-1028-CRB

22 *Jane Doe CLF B.T. v. Uber Technologies,*  
23 *Inc., et al.*, No. 3:25-cv-1029-CRB

24 *Jane Doe CLF H.K. v. Uber Technologies,*  
25 *Inc., et al.*, No. 3:25-cv-1031-CRB

26 *Jane Doe CLF C.G. v. Uber Technologies,*  
27 *Inc., et al.*, No. 3:25-cv-1033-CRB

28 *Jane Doe CLF K.J. v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv-1035-CRB

*Jane Doe CLF A.C. v. Uber Technologies,*  
*Inc., et al.*, No. 3:25-cv-1037-CRB



1 *Jane Doe CLF T.S. v. Uber Technologies,*  
 2 *Inc., et al., No. 3:25-cv-1038-CRB*

3 *Jane Doe CLF S.H. v. Uber Technologies,*  
 4 *Inc., et al., No. 3:25-cv-1040-CRB*

5 *Jane Doe CLF A.B. v. Uber Technologies,*  
 6 *Inc., et al., No. 3:25-cv-1041-CRB*

7 *Jane Doe CLF J.T. v. Uber Technologies,*  
 8 *Inc., et al., No. 3:25-cv-1043-CRB*

9 *Jane Doe CLF L.K. v. Uber Technologies,*  
 10 *Inc., et al., No. 3:25-cv-1045-CRB*

11 *Jane Doe CLF J.R. v. Uber Technologies,*  
 12 *Inc., et al., No. 3:25-cv-1046-CRB*

13 *Jane Doe CLF D.T. v. Uber Technologies,*  
 14 *Inc., et al., No. 3:25-cv-1048-CRB*

15 *Jane Doe CLF S.F. v. Uber Technologies,*  
 16 *Inc., et al., No. 3:25-cv-1050-CRB*

17 *Jane Doe CLF S.W. v. Uber Technologies,*  
 18 *Inc., et al., No. 3:25-cv-1051-CRB*

19 *Jane Doe CLF K.B. v. Uber Technologies,*  
 20 *Inc., et al., No. 3:25-cv-1053-CRB*

21 *Jane Doe CLF H.P. v. Uber Technologies,*  
 22 *Inc., et al., No. 3:25-cv-1285-CRB*

23 The Court hereby GRANTS the parties' stipulation as follows:

24 1. A Plaintiff Fact Sheet for the Plaintiffs in the following cases, each represented by  
 25 Clarkson Law Firm, P.C., is due by March 24, 2025:

26 a. *Jane Doe CLF V.M. v. Uber Technologies, Inc., et al., No. 3:25-cv-1022-CRB*

27 b. *Jane Doe CLF A.H. v. Uber Technologies, Inc., et al., No. 3:25-cv-1023-CRB*

28 c. *Jane Doe CLF K.R. v. Uber Technologies, Inc., et al., No. 3:25-cv-1025-CRB*

d. *Jane Doe CLF K.G. v. Uber Technologies, Inc., et al., No. 3:25-cv-1028-CRB*

e. *Jane Doe CLF B.T. v. Uber Technologies, Inc., et al., No. 3:25-cv-1029-CRB*

f. *Jane Doe CLF H.K. v. Uber Technologies, Inc., et al., No. 3:25-cv-1031-CRB*

g. *Jane Doe CLF C.G. v. Uber Technologies, Inc., et al., No. 3:25-cv-1033-CRB*

- h. *Jane Doe CLF K.J. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1035-CRB
  - i. *Jane Doe CLF A.C. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1037-CRB
  - j. *Jane Doe CLF T.S. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1038-CRB
  - k. *Jane Doe CLF S.H. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1040-CRB
  - l. *Jane Doe CLF A.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1041-CRB
  - m. *Jane Doe CLF J.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1043-CRB
  - n. *Jane Doe CLF L.K. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1045-CRB
  - o. *Jane Doe CLF J.R. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1046-CRB
  - p. *Jane Doe CLF D.T. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1048-CRB
  - q. *Jane Doe CLF S.F. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1050-CRB
  - r. *Jane Doe CLF S.W. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1051-CRB
  - s. *Jane Doe CLF K.B. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1053-CRB
  - t. *Jane Doe CLF H.P. v. Uber Technologies, Inc., et al.*, No. 3:25-cv-1285-CRB
2. A Defendant Fact Sheet for each of the aforementioned Plaintiffs represented by Clarkson Law Firm, P.C. is due on April 23, 2025.
  3. These deadlines may be subject to further revision, by agreement among the parties or by application to and approval of the Court, as described in the final WHEREAS clause of the parties' stipulation.

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Date: \_\_\_\_\_, 2025

\_\_\_\_\_  
HON. CHARLES R. BREYER  
UNITED STATES DISTRICT JUDGE